

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF
ILLINOIS EASTERN DIVISION**

CORNEL BRISCO

Plaintiff,

v.

Case No. 2019 cv 7233

CHICAGO POLICE OFFICERS VINCENT
STINAR, STAR NO. 4017
LENNY PIERRI, STAR NO. 10956
CITY OF CHICAGO

Honorable Steven Seeger,
Judge Presiding

Defendants.

JOINT STATUS REPORT

NOW COMES the Plaintiff, CORNEL BRISCO, by and through his attorneys Stephen L. Richards and Joshua S.M. Richards, Defendant, CITY OF CHICAGO, by and through its attorney, Mark A. Flessner, Corporation Counsel of the City of Chicago, and Defendants Vincent Stinar and Lenny Pierri, by and through one of their attorneys, Victoria R. Benson, Deputy Corporation Counsel, and file the following joint status report in compliance with the Third Amended General Order of April 24, 2020 (Dkt No. 24). The parties state as follows:

- (a) No discovery has been undertaken so far as a 12(b)(6) motion is pending. The parties propose exchanging MIDP disclosures if the Court denies Defendants' Motion, and if then, approximately 30 days after any such denial.
- (b) The defendants' 12(b)(6) motion was filed on February 18, 2020.
- (c) There are no settlement efforts on-going. Per the court's order, plaintiff sent defendants a demand letter, and defendants have indicated that they have no offer to tender at this time.

- (d) Defendants filed a motion to dismiss on February 18, 2020. Plaintiff's response was due on March 30, 2020, but plaintiff filed early on March 8, 2020. Defendant's reply was due on April 13, 2020, but these deadlines were extended due to the general COVID order. Defendants intend to file their reply well before the end of May.
- (e) Other than the date for filing of the reply brief, the parties have no 45 day proposed schedule to propose pending this court's decision on the motion to dismiss.
- (f) The parties do not believe that an adjustment to the current discovery schedule is necessary until this court issues its ruling.
- (g) Agreed proposed discovery and dispositive motion schedule:
- (1) Completion of fact discovery:
November 30, 2020
 - (2) Disclosure of Plaintiff's Expert Reports
December 31, 2020
 - (3) Deposition of Plaintiff's Expert
February 1, 2021
 - (4) Disclosure of Defendants' Expert Reports
March 3, 2021
 - (5) Deposition Defendants' Expert(s)
April 2, 2021
 - (6) Deadline to file dispositive motions
May 19, 2021
- Plaintiff does not anticipate expert discovery and reserves the right to move to advance the deadline for dispositive motions if no expert discovery takes place.

(h) There are no requests for agreed action.

(i) The parties do not believe a telephonic hearing is necessary at this time.

CORNEL BRISCO,

Plaintiff,

/s/ Stephen L. Richards

By: Stephen L. Richards

Attorney for Plaintiff

53 West Jackson Suite 756

Chicago, IL 60604

773-817-6927

sricha5461@aol.com

Attorney No: 6191946

/s/ Victoria R. Benson

Victoria R. Benson, Deputy Corporation Counsel

Allison L. Romelfanger, Assistant Corporation Counsel Supervisor

Jordan F. Yurchich, Assistant Corporation Counsel

Nathan A. Shine, Assistant Corporation Counsel

Department of Law, City of Chicago

Federal Civil Rights Litigation Division

30 N. LaSalle Street

Suite 900

Chicago, IL 60602

(312) 744-4883

victoria.benson@cityofchicago.org

/s/Marques Alan Berrington

City Of Chicago, Department Of Law
30 N. Lasalle St.
Suite 900
Chicago, IL 60602
(312) 744-6995
Not a member (fax)
marques.berrington@cityofchicago.org

CERTIFICATION OF COUNSEL

The undersigned, Stephen L. Richards hereby certifies that the following document, **JOINT STATUS REPORT** was served on May 14, 2020 in accordance with Fed. R. Civ. P. 5, LR 5.5, and the General Order on Electronic Case Filing (ECF), pursuant to the district court's ECF system as to ECF filers, and was sent by first-class mail or by hand delivery to non-ECF filers, if any.

CORNEL BRISCO

Plaintiff,
/s/ Stephen L. Richards
By: Stephen L. Richards
Attorney for Plaintiff
53 West Jackson Suite 756

Chicago, IL 60604
773-817-6927
sricha5461@aol.com
Attorney No: 6191946